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VIA ECF

January 20, 2021

Honorable Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
New York, NY 11201

**Re: *Finnigan, et al. v. Canon U.S.A., Inc.*
Case No.: 1:20-cv-06239-AMD-SJB**

***Hamid v. Canon U.S.A., Inc., et al.*
Case No.: 1:20-cv-06380-AMD-SJB**

Dear Judge Donnelly:

Plaintiffs write to inform the Court of a stipulation reached, subject to the Court's approval, between Plaintiffs in this case and the plaintiff in *Hamid v. Canon U.S.A., Inc. et al.*, No. 1:20-cv-06380-AMD-SJB, on the one hand, and Defendants in those respective cases on the other. Both cases are pending before Your Honor and are related actions since they arise out of the same alleged data breach involving the Defendants.

As set forth in the proposed stipulation filed contemporaneously with this letter, the parties agree that consolidation is appropriate under Federal Rule of Civil Procedure 42(a) because the related actions involve common questions of law or fact, specifically, the cases both name Canon U.S.A., Inc., arise from the same alleged events and assert overlapping claims and putative classes. The parties therefore respectfully request that the Court enter the proposed stipulation consolidating the actions and set related scheduling deadlines for appointment of interim class counsel, a consolidated complaint, and a briefing schedule for any motion to dismiss the consolidated complaint, in accordance with the proposed stipulation. The parties submit that

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proceeding in this fashion will promote efficiency and conserve judicial resources.

The parties thank the Court in advance for its consideration of the proposed stipulation and are available to address any questions the Court may have.

Respectfully submitted,

/s/ Gary S. Graifman

cc: All Plaintiffs' Counsel of Record